

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

THE STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

**JOINT REPORT REGARDING NON-PARTY META PLATFORMS, INC.’S  
OPPOSED MOTION FOR A PROTECTIVE ORDER**

Pursuant to the Special Master’s August 5, 2024 Order, Dkt. 589, Non-Party Meta Platforms, Inc. (“Meta”) and State Plaintiffs respectfully provide the following joint report regarding Meta’s Opposed Motion for a Protective Order (“Motion”), Dkt. 521.

On June 12, 2024, Meta moved for a protective order prohibiting the production by Defendant Google LLC in this case of certain Meta documents that had been produced to Google by the United States in a separate action captioned *United States v. Google LLC*, No. 1:23-cv-000108 (E.D. Va.) (“EDVA Action”). *Id.* State Plaintiffs opposed the Motion, Dkt. 557, and Meta filed a reply, Dkt. 577. The Court referred the Motion to the Special Master for consideration and entry of a report and recommended disposition. Dkt. 588. The Special Master subsequently ordered Meta and State Plaintiffs to meet and confer and to file a Joint Status Report. Dkt. 589.

On August 9, 2024, counsel for Meta and State Plaintiffs met and conferred to attempt to narrow or resolve the dispute set forth in the briefing on the Motion. Meta was represented at the meet-and-confer by Kate Patchen and Michael Bowlus. State Plaintiffs were represented at the meet-and-confer by Marc Collier, Ethan Glenn, and Shane Kelly. Google was represented at the meet-and-confer by Neelesh Moorthy. Meta and State Plaintiffs were unable to resolve the dispute and believe the issue is ripe for resolution by the Special Master.

Dated: August 9, 2024

/s/ Melissa R. Smith

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*/s/ W. Mark Lanier*

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*/s/ Ashley Keller*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this 9th day of August 2024.

/s/ *Melissa R. Smith*  
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